

EXHIBIT A

Jennifer Ford vs Veterans Guardian VA Claim Consulting
Kehoe, Samantha on 11/07/2024

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION

CASE NO. 1:23-cv-756-CCE-LPA

JENNIFER FORD, individually and
on behalf of all others similarly
situated,

Plaintiff,

vs.

VETERANS GUARDIAN VA CLAIM CONSULTING, LLC,

Defendant.

DEPOSITION OF SAMANTHA KEHOE

TAKEN ON BEHALF OF THE PLAINTIFF

NOVEMBER 7TH, 2024
10:03 A.M. TO 4:26 P.M.

ALL PARTIES APPEARED REMOTELY
PURSUANT TO
FLORIDA SUPREME COURT ORDER AOSC20-23

REPORTED BY:
ABIGAIL HOGARTH, CER, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA



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<p style="text-align: right;">Page 146</p> <p>1 A I can't imagine that section right now.</p> <p>2 Q Okay. Give me one second. I'm going to get</p> <p>3 an Exhibit pulled up. Okay. And I think I know how to</p> <p>4 get this so that it shows up on your end. Let me see</p> <p>5 here.</p> <p>6 Okay. Ms. Kehoe, can you see the document</p> <p>7 that I have pulled up here?</p> <p>8 A Yes.</p> <p>9 MR. BROCHU: And Madam Court Reporter, please</p> <p>10 mark this as Exhibit 1, Bates Number VG0005830.</p> <p>11 (Thereupon, Plaintiff's Exhibit 1 was entered</p> <p>12 into the record.)</p> <p>13 THE COURT REPORTER: Okay.</p> <p>14 BY MR. BROCHU:</p> <p>15 Q Ms. Kehoe, have you ever seen this document</p> <p>16 before?</p> <p>17 A Yes.</p> <p>18 Q When's the first time you saw this document?</p> <p>19 A I am not sure.</p> <p>20 Q Do you know who prepared this document?</p> <p>21 A I do not.</p> <p>22 Q Did you see this for the first time in the</p> <p>23 last week?</p> <p>24 A I don't believe so.</p> <p>25 Q Was it during the first month of your</p>	<p style="text-align: right;">Page 148</p> <p>1 Q Oh, Jason, I'm sorry. Jason Thomas. What's</p> <p>2 Mr. Thomas title?</p> <p>3 A I am not sure. He's the only member of IT I</p> <p>4 remember.</p> <p>5 Q Okay. Now, is he the one that sets you up if</p> <p>6 you get locked out of Salesforce or who's he?</p> <p>7 A I'm not sure what his role is with the IT</p> <p>8 department. He's the only member of the IT department</p> <p>9 whose name I can remember at this time.</p> <p>10 Q Okay. Now, is he part of IT development or IT</p> <p>11 operations? Any idea?</p> <p>12 A I do not know.</p> <p>13 Q And what about veteran experience?</p> <p>14 A I do not know.</p> <p>15 Q Marketing and social media, who runs those</p> <p>16 departments?</p> <p>17 A Joanna Murphy.</p> <p>18 Q Joanna Murphy?</p> <p>19 A Yes.</p> <p>20 Q Would it surprise you that Veterans Guardian</p> <p>21 is advertising using the word VSO near me?</p> <p>22 A Yes.</p> <p>23 Q Is Veterans Guardian directly competing with</p> <p>24 Veterans Service Organizations?</p> <p>25 A I'm not sure.</p>
<p style="text-align: right;">Page 147</p> <p>1 employment?</p> <p>2 A No.</p> <p>3 Q Okay. And who is the Chief Executive Officer</p> <p>4 of Veterans Guardian?</p> <p>5 A Scott Greenblatt.</p> <p>6 Q Who's the Chief Operating Officer?</p> <p>7 A Bill Taylor.</p> <p>8 Q Human Resources?</p> <p>9 A I'm sorry, do you want the name of --</p> <p>10 Q Yeah, the name if you know it?</p> <p>11 A Abby -- I'm sorry, I cannot remember her last</p> <p>12 name right now.</p> <p>13 Q Okay. Government Affairs. Who runs that</p> <p>14 department at Veterans Guardian?</p> <p>15 A I am not sure.</p> <p>16 Q Facilities. Any idea?</p> <p>17 A No.</p> <p>18 Q IT development?</p> <p>19 A I do not know.</p> <p>20 Q Who's the highest-ranking member of Veterans</p> <p>21 Guardian that works in the ID -- IT department that you</p> <p>22 know?</p> <p>23 A Jason Thomas.</p> <p>24 Q Mason Thomas?</p> <p>25 A Jason.</p>	<p style="text-align: right;">Page 149</p> <p>1 Q Do you think that Veterans Guardian is a</p> <p>2 direct competitor to a Veterans Service Organization?</p> <p>3 A I do not know.</p> <p>4 Q Do you think in your own understanding of</p> <p>5 public policy, based on your background, that Veterans</p> <p>6 Guardian is competing with VA accredited</p> <p>7 representatives?</p> <p>8 A No.</p> <p>9 Q Why not?</p> <p>10 A I just do not believe that Veterans Guardian</p> <p>11 is, I know.</p> <p>12 Q Well, you told me earlier that there's nothing</p> <p>13 that Veterans Guardian does that a VA accredited agent</p> <p>14 or attorney can't do, right?</p> <p>15 A Correct.</p> <p>16 Q So, how does that not make Veterans Guardian a</p> <p>17 direct competitor to a VA accredited agent?</p> <p>18 A I'm not sure.</p> <p>19 Q Okay. So, you agree with me that if Veterans</p> <p>20 Guardian does the exact same thing that a VA accredited</p> <p>21 agent does, that they would be direct competitors? That</p> <p>22 makes sense. Doesn't it?</p> <p>23 MS. WOLVERTON: Objection. Assumes facts not</p> <p>24 in evidence.</p> <p>25 A Yes. That makes sense.</p>



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<p style="text-align: right;">Page 254</p> <p>1 I don't know if your Counsel has any other 2 questions for you at this time, but as of right 3 now, I do not have any other questions for you. 4 But I do want to thank you and your husband 5 for your service to our country and for your time 6 today. 7 MS. WOLVERTON: Thanks so much. Well, we'll 8 just ask to take a two-minute break and we'll be 9 right back. So, can we go off the record for two 10 minutes? 11 (Thereupon, a short discussion was held off 12 record.) 13 (Deposition resumed.) 14 THE COURT REPORTER: Okay. We're back on the 15 record. 16 MS. WOLVERTON: No questions. 17 MR. BROCHU: No further questions from us 18 either, Ms. Kehoe greatly appreciate your time. 19 Safe travels home. Thank you. 20 MS. WOLVERTON: Thank you so much. And we do 21 reserve the right to read and sign the transcript, 22 please. 23 THE COURT REPORTER: Okay. Thank you. And 24 Counsel, would you like to order the transcript 25 today?</p>	<p style="text-align: right;">Page 256</p> <p>CERTIFICATE OF REPORTER STATE OF FLORIDA COUNTY OF BROWARD I, ABIGAIL HOGARTH, Court Reporter and Notary Public for the State of Florida, do hereby certify that I was authorized to and did digitally report and transcribe the foregoing proceedings, and that the transcript is a true and complete record of my notes. I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action. Witness my hand this 21st day of November, 2024.  _____ ABIGAIL HOGARTH, COURT REPORTER NOTARY PUBLIC, STATE OF FLORIDA</p>
<p style="text-align: right;">Page 255</p> <p>1 MS. WOLVERTON: Yes, please. 2 THE COURT REPORTER: Okay. Mr. Brochu, would 3 you like to order the transcript as well? 4 MR. BROCHU: Yes, please. 5 THE COURT REPORTER: All right. Standard 6 delivery, 10 business days is, okay? 7 MS. WOLVERTON: Yes. 8 MR. BROCHU: Ten business. Yeah, that should 9 be fine. And we'll get you all of the Exhibits -- 10 THE COURT REPORTER: Okay. Perfect. 11 MR. BROCHU: -- as well offline. 12 THE COURT REPORTER: All right. Thank you. 13 I'll go off the record now. 14 (Deposition concluded at 04:26 p.m.) 15 (Reading and signing of the deposition by the 16 witness has been reserved.) 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 257</p> <p>CERTIFICATE OF OATH STATE OF FLORIDA COUNTY OF BROWARD I, ABIGAIL HOGARTH, the undersigned authority, certify that SAMANTHA KEHOE, appeared before me and was duly sworn on the 7th day of November, 2024. Witness my hand this 21st day of November, 2024.  _____ ABIGAIL HOGARTH, COURT REPORTER NOTARY PUBLIC, STATE OF FLORIDA Commission No.: HH 89474 Commission Exp: 02/07/2025</p>



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